

## REMARKS

### Request for Reconsideration

Applicants have carefully considered the matters raised by the Examiner in the outstanding Office Action but remain of the opinion that patentable subject matter is present. Applicants respectfully request reconsideration of the Examiner's position based on the above amendments to the Claims, the attached Declaration of Mr. Murakami and the following remarks.

### Claims Status

Claims 1-3, 5, and 7-24 are pending in this Application. Claims 21-24 have been withdrawn while the remaining claims are under prosecution.

Claim 1 has been amended herein to more particularly point out and distinctly claim the present Invention. Namely, the step of curing individual ink droplets to form the microscopic roughened structure of discontinuous ink droplets has been recited. It is believed that this step of curing was inherent in Claim 1, however, to make explicit, this step of curing has been recited.

Claims 5 and 7 have been amended to bring them in line with respect to the amendments made to Claim 1.

#### The Interview

Applicants' below-signed representative would like to thank Examiner Vetere for the courtesy extended to him during the Telephone Interview on March 12, 2009. As discussed during the Interview, Applicants have made the product of the materials of Shoshi and tested it to see if it could be ink jetted. Additionally, Applicants took their material and tested it to show the difference between a continuous and discontinuous layer. These tests are reported in the Declaration attached hereto and will be discussed in more detail below.

#### Prior Art Rejection

The Examiner put forward the following six Prior Art rejections:

- (1) Claims 1, 2, 4, 5, 11-13 and 19 are rejected as unpatentable over Shoshi (US 5,998,013) and George (US 6,545,422);
- (2) Claim 3 is rejected as unpatentable over a combination of Shoshi, George and Namoiika (US 6,419,366);

- (3) Claims 6-10, 15, 17, and 20 are rejected as being unpatentable over a combination of Shoshi, George and Ohishi (US 2002/0034008);
- (4) Claim 14 is being rejected as being unpatentable over the combination of Shoshi, George and Logan (US 4,575,730);
- (5) Claim 16 is rejected as being unpatentable over a combination of Shoshi, George, Ohishi, and Hirose (US 6,533,852); and
- (6) Claim 18 is rejected as being unpatentable over a combination of Shoshi, George, Ohishi and Matsunaga (US 6,398,371).

In each one of these rejections, the Examiner's position is that Shoshi teaches an anti-glare coating composition that can be applied through an inkjet method to the substrate.

As brought out in the Declaration, Applicants have made the material of Examples 1-4 of Shoshi and tried to jet that material with an inkjet in order to make a coating. In all cases, no coating was made. For the coating of Examples 1-3, these materials could not be jetted. For the coating of Example 4, the nozzle quickly clogged and, thus, no coating was able to be made. Thus, even if one were to combine the references as proposed by

the Examiner, one does not arrive at the present Invention because Shoshi's material is inoperative in an inkjet apparatus.

Thus, it is respectfully submitted that Applicants' claims are patentable over the cited references since the cited references do not operate to form a discontinuous layer in an inkjet apparatus.

As discussed during the Interview, the discontinuous coating of the present Invention produces surprising and unexpected results compared to a continuous layer. In order to demonstrate that the discontinuous layer of the present Invention does provide surprising and unexpected results, the ink of Example 1-3 of this Application were prepared and two different films were formed and tested. One set of films had a discontinuous layer of the ink and another set of films had a continuous layer. The continuous layer is referred to in the Declaration as Films 5B, 6B and 7B. Each one of the films were then used to make a polarized plate and the polarized plates were tested for

visibility and image quality sharpness. Results of these tests were reported in Table 2B of Mr. Murakami's Declaration.

It can be seen in Table 2B, that the discontinuous films, Films 5-7, produced far superior results to the films with the continuous layer, Films 5B-7B. It is submitted that when reading the references, one would not be lead to the belief that a superior product is made using a discontinuous inkjet process of the present Invention. Thus, it is respectfully submitted that the claims are clearly patentable over the cited references alone or in combination.

#### Conclusion

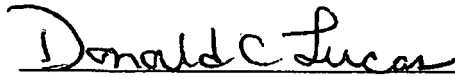
In view of the foregoing and the attached, it is respectfully submitted that the Application is in condition for allowance and such action is respectfully requested.

Should any fees or extensions of time be necessary in order to maintain this Application in pending condition, appropriate requests are hereby made and authorization is given to debit account #02-2275.

Respectfully submitted,

LUCAS & MERCANTI, LLP

By:



Donald C. Lucas, Reg. # 31,275  
(Attorney for Applicant)  
475 Park Avenue South  
New York, New York 10016  
Tel. # (212) 661-8000

DCL/mr

Attached: Executed Declaration of Mr. Takashi Murakami  
signed on April 22, 2009.